

ALB:JLG
F. #2018R02310

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

MARIA ELISEO,

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Commit Bank Fraud)

1. In or about and between July 2013 and March 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARIA ELISEO, together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud a financial institution, to wit: Citibank, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys and funds owned by and under the custody and control of said financial institution by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ APR 29 2019 ★

LONG ISLAND OFFICE

I N F O R M A T I O N

Cr. No. 19 - 182 (JS)
(T. 18, U.S.C., §§ 982(a)(2), 982(b)(1),
1344, 1349, 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p))

COUNT TWO
(Bank Fraud)

2. In or about and between July 2013 and March 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARIA ELISEO, together with others, did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit: Citibank, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys and funds owned by and under the custody and control of said financial institution by means of materially false and fraudulent pretenses, representations and promises.

(Title 18, United States Code, Sections 1344, 2 and 3551 et seq.)

COUNT THREE
(Bank Fraud)

3. In or about and between March 2018 and April 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARIA ELISEO, together with others, did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit: Wells Fargo Bank, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys and funds owned by and under the custody and control of said financial institution by means of materially false and fraudulent pretenses, representations and promises.

(Title 18, United States Code, Sections 1344, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

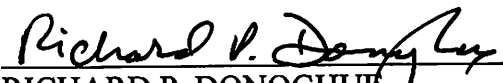
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(2) and 982(b)(1); Title 21,
United States Code, Section 853(p))



RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2018R02310
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MARIA ELISEO,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 982(a)(2), 982(b)(1), 1344, 1349, 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p))

Filed in open court this _____ *day.*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Justina L. Geraci, Assistant U.S. Attorney (631) 715-7835